

## Stakeholder Comments Template

| Submitted by   | Company         | Date Submitted |
|--|-----------------|----------------|
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Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Draft Final Proposal posted on November 13, 2018.

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due December 6, 2018 by 5:00pm**  
***(updated from December 3 during the stakeholder meeting)***

The draft final proposal posted on November 13, 2018 and the presentation discussed during the November 20, 2018 stakeholder meeting can be found on the CAISO webpage at the following link:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>

Please use this template to provide your written comments on the Issue Paper topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Issue Paper for convenience.

## 7. Interconnection Financial Security and Cost Responsibility

### 7.1 Maximum Cost Responsibility for NUs and Potential NUs

Specific Question regarding the establishment of the Maximum Cost Exposure (MCE).  
Would stakeholders prefer:

- (1) the MCE remain established at the true cost exposure of a project that demonstrates the ultimate cost the project could be responsible for when taking into consideration potential system changes, without opportunity for reduction?

OR

- (2) the MCE could be adjusted downward with the MCR, but could ultimately go back up if system changes occur, similar to how the MCR can increase pursuant to Appendix DD, Section 7.4?

Please find the following comments on behalf of Intersect Power related to item 7.1:

1. Intersect would prefer the first of the two options presented in the specific questions above.
2. Can the CAISO please clarify which Clusters these changes will be applicable given the change in milestone from LGIA execution to third IFS posting could impact projects that are advanced in the interconnection study process?
3. Intersect Power believes the MCE should have the ability to be revised downward due to either (i) the removal of a CANU (as proposed), **or (2) the removal or reduction of an ANU meeting the criteria outlined in Appendix DD Section 7.4, down to the minimum MCR established by the Interconnection Studies.** As currently proposed, CANUs create headroom in the MCE, which can ultimately be utilized by future ANUs (as a result of system changes and unrelated to CANUs converted to ANUs). This is exemplified in the CAISO Example 3) in the presentation materials from November 12, 2018, under which the MCE does not decrease when ANUs are removed and the additional headroom is then partially utilized by a new, unforeseen ANU (ANU6 in the example) . If CANUs had not originally factored into the equation, the IC's MCR for ANUs would have been capped at \$9M, and this new, unforeseen ANU could not increase that amount.

## **10. Additional Comments**

## **11. New Topics – Interconnection Request Acceptance and Validation Criteria**

11.1 Interconnection Request Acceptance

11.2 Validation Criteria